

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

STEPHEN MCCOLLUM, *et al.*,
Plaintiffs,

v.

BRAD LIVINGSTON, *et al.*,
Defendants.

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CIVIL NO. 4:14-CV-3253

Exhibit 4

THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

STEPHEN McCOLLUM, STEPHANIE *
KINGREY, and SANDRA *
McCOLLUM, individually and as *
heirs at law to the Estate of *
LARRY GENE McCOLLUM, *

PLAINTIFFS *

vs. * CIVIL ACTION NO.
* 3:12-CV-02037

BRAD LIVINGSTON, JEFF PRINGLE, *
RICHARD CLARK, KAREN TATE, *
SANDREA SANDERS, ROBERT EASON, *
the UNIVERSITY OF TEXAS *
BRANCH and the TEXAS *
DEPARTMENT OF CRIMINAL JUSTICE *

DEFENDANTS *

ORAL VIDEOTAPED 30(B)6 DEPOSITION OF JEFF PRINGLE
August 12th, 2013

ORAL VIDEOTAPED 30(B)6 DEPOSITION OF JEFF
PRINGLE, produced as a witness at the instance of the
Plaintiffs and duly sworn, was taken in the above-styled
and numbered cause on the 12th day of August, 2013, from
10:33 a.m. to 1:33 p.m., before Curtis High, Certified
Shorthand Reporter in and for the State of Texas,
reported by computerized stenotype machine at the
Hutchins Unit of the Texas Department of Criminal
Justice, 1500 E. Langdon Road, Dallas, Texas 75241,
pursuant to the Federal Rules of Civil Procedure and the
provisions stated on the record or attached hereto.

1 A No.

2 Q Okay. When you made this request to
3 Ms. Gilford, and I apologize, the other person's name
4 from UTMB, was that before or after Mr. McCollum's
5 death?

6 A I would have asked them if they had a video
7 before the...

8 Q Before the death?

9 A After the death.

10 Q After the death?

11 A Before the mediation.

12 Q Do you know if anybody else has suffered any
13 heat exhaustion at the -- at the Hutchins Unit following
14 Mr. McCollum's death?

15 A Yes.

16 Q Do you know what happened in that incident?

17 A As testified in my previous deposition it was
18 an employee that was working from -- on the outside
19 visitation who felt ill.

20 Q What about inmates? I thought there was at
21 least one inmate who suffered a heat exhaustion or heat
22 related illness at the Hutchins Unit. Am I mistaken?

23 A He was working in the boiler room which is a
24 hot working environment and became ill.

25 Q How hot is the boiler room?

1 A I do not know.

2 Q Does anybody ever take temperatures in there?

3 A No.

4 Q Do you know if he was on any heat list?

5 A No, I do not.

6 Q If he was on a heat list should he have been
7 working in the boiler room?

8 A If he was on the list he would have been
9 reassigned.

10 Q Okay. Just so I am clear, if that particular
11 person had let's say hypertension or some condition
12 which made him vulnerable to the heat, he should not
13 have been working in the boiler room?

14 MR. GARCIA: Objection, speculation.

15 THE WITNESS: Not that he should not. He
16 would have been reassigned.

17 Q (By Mr. Edwards) Why would he have been
18 reassigned?

19 A Because boilers are hot.

20 Q That the only reason?

21 A Yes.

22 MR. EDWARDS: All right. I want to thank
23 you very much and I pass the witness.

24 MR. GARCIA: Can I get that microphone?

25 EXAMINATION